

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

MEMO ENDORSED

Joel Grunfeld, individually and on behalf of  
all others similarly situated,

Plaintiff,

- v -

TransUnion, LLC,  
U.S. Bank, N.A.,  
and John Does 1-25.

Defendants.

X

Civil Action No. 7:19-cv-11781 (KMK)

*Electronically Filed*

**Oral Argument Requested**

X

**DEFENDANT U.S. BANK NATIONAL ASSOCIATION'S  
NOTICE OF MOTION TO DISMISS, OR, IN THE ALTERNATIVE,  
TO STAY THE ACTION IN FAVOR OF INDIVIDUAL ARBITRATION**

**PLEASE TAKE NOTICE** that, upon the accompanying Memorandum of Law in Support of U.S. Bank National Association's Motion to Dismiss, Or, in the Alternative, to Stay the Action in Favor of Individual Arbitration; the Declaration of Lynne Kreimer and the exhibits attached thereto; and the Declaration of Kenneth M. Kliebard and the exhibits attached thereto, Defendant U.S. Bank National Association, will move this Court, before the Honorable Kenneth M. Karas, in the United States District Court, at the United States District Courthouse for the Southern District of New York, 300 Quarropas Street, Courtroom 521, White Plains, NY 10601, on a date and at a time to be designated by the Court, for an Order dismissing the putative class action claims of Plaintiff, Joel Grunfeld, in favor of arbitration proceedings on an individual basis, or, in the alternative, staying those claims pending the completion of individual arbitration proceedings under Rule 12(b)(1) of the Federal Rules of Civil Procedure.

SO ORDERED

KENNETH M. KARAS U.S.D.J.

2/24/20

*The Motion is  
denied without prejudice  
for failure to comply with the  
Court's individual rules. Defendant must file  
a written letter before filing this Motion.*

Dated: February 20, 2020

Respectfully submitted,

/s/ Kenneth M. Kliebard

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